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June 7, 2021

**By ECF**

Honorable Nicholas G. Garaufis  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Percy, et al. v. Oriska General Contracting, et al., 21-cv-02314, et al.

Dear Judge Garaufis:

I have been consulted by James Kernan, Esq., counsel for the Class Representatives, in connection with Your Honor's May 27, 2021 Order to Show Cause in the above-captioned matters. In advance of filing my notice of appearance on his behalf in this matter, given the serious issues raised in the Order to Show Cause, I respectfully request an extension of time to make an appropriate responsive submission to July 30, 2021. Should the Court grant my extension request, I will promptly file a notice of appearance in this matter.

There are several reasons for my request for an extension of time to submit a response. My firm's practice focuses on attorney ethics and professional responsibility matters. I and my staff are currently shouldering an extraordinary heavy load of unexpected grievances including a large sanction matter in the United States District Court for the Southern District of New York, as well as multiple submissions due to the Appellate Divisions. In addition, I and my staff are continuing to submit on a rolling basis multiple answers to the Grievance Committees in connection ethical grievances. Separately, as the Court is aware, the Court's Order raises complicated legal and factual issues which must carefully be addressed.

No prior similar relief has been requested by the parties.

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Respectfully submitted,

/s/Michael S. Ross  
Michael S. Ross

cc: All Counsel  
(By ECF)